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July 2, 2014

Honorable Kevin McNulty, U.S.D.J.
United States District Court
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101-0999

Re: Daniel Bock, Jr. vs. Pressler and Pressler, LLP, Case 2:11-cv-07593-KM-MCA

Dear Judge McNulty,

I represent the Plaintiff, Daniel Bock, Jr.

Your Honor's Order [ECF No. 60] directed the filing of letter briefs on the issue of Plaintiff's damages. To avoid further litigation of the issue but without implying any waiver of Defendant's right to appeal or the effect of a reversal on appeal, the parties have agreed to stipulate that Plaintiff's damages are \$1,000.00. I enclose that Stipulation.

The remaining issue in the case is resolving Plaintiff's attorney's fees and costs. The parties have agreed to make a good faith effort to resolve that issue by consent. Failing such consent, I will file the appropriate motion.

Thank you for Your Honor's consideration in this matter.

Respectfully,



Philip D. Stern

Enclosure
via ECF

cc: Daniel Bock, Jr.
Mitchell L. Williamson, Esq. via ECF

PHILIP D. STERN ATTORNEY AT LAW LLC
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Representing Plaintiff, Daniel Bock, Jr.

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY**

DANIEL BOCK, JR.,
Plaintiff,

vs.

PRESSLER AND PRESSLER, LLP,
Defendant.

Case 2:11-cv-07593-KM-MCA

STIPULATION OF DAMAGES

Plaintiff, Daniel Bock, Jr., and Defendant, Pressler and Pressler, LLP,
stipulate and agree as follows:

1. By Order [ECF No. 60] filed on June 30, 2014, the Court granted Plaintiff's summary judgment motion, denied Defendant's summary judgment motion, and directed the parties to submit "letter briefs concerning the appropriate measure of damages."

2. The Complaint's prayer for damages was for "statutory damages" pursuant to 15 U.S.C. § 1692k(a)(2)(A), which are limited to \$1,000.00.

3. To avoid the time and expense of preparing the ordered letter briefs and for the purpose of judicial economy, Plaintiff and Defendant stipulate to \$1,000.00 as the amount of Plaintiff's damages.

4. This Stipulation is entered between the parties without prejudice to the Defendant's right to appeal the finding of liability entered by way of

summary judgment, *i.e.* Defendant's right to appeal is expressly preserved.

5. The parties further agree that the instant Stipulation is rendered moot if Defendant takes, and is successful, in an appeal on the issue of liability.

	Philip D. Stern Attorney at Law, LLC Representing Plaintiff, Daniel Bock, Jr.
	<i>s/Philip D. Stern</i>
Dated: July 2, 2014	Philip D. Stern

	Pressler and Pressler, LLP
	<i>s/Mitchell L. Williamson</i>
Dated: July 2, 2014	Mitchell L. Williamson